

ORIGINAL

David P. Stich, Esq. (DPS-9096)
Solomon Pearl Blum Heymann & Stich LLP
40 Wall Street, 35th Floor
New York, New York 10005
Local Counsel for Defendant
Certain Underwriters at Lloyd's, London

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

RAILROAD INSURANCE UNDERWRITERS,

Plaintiff,

v.

CERTAIN UNDERWRITERS AT LLOYD'S,
LONDON, EXCESS INSURANCE
COMPANY LIMITED and HARPER
INSURANCE LIMITED,

Defendants.

Case No. 07 Civ. 3071 (LLS)


MOTION TO ADMIT COUNSEL PRO HAC VICE

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, David P. Stich, Esq., a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of

Applicant's Name: Bruce R. Grace
Firm Name: Baach Robinson & Lewis PLLC
Address: 1201 F Street, NW, Suite 500
City/State/Zip: Washington, DC 20004-1225
Phone Number: 202-659-6742
Fax Number: 202-466-5738

Bruce Grace is a member in good standing of the Bar of the State of New York and the District of Columbia. There are no pending disciplinary proceedings against Bruce Grace in any State or Federal Court.

Dated: New York, New York
May 8, 2007



David P. Stich, Esq. (DPS-9096)
Solomon Pearl Blum Heymann & Stich LLP
40 Wall Street, 35th Floor
New York, New York 10005
Business phone: (212) 267-7600
Business fax: (212) 267-2030

TO: Allan J. Sorkowitz, Esq.
SIDLEY AUSTIN LLP
787 Seventh Avenue
New York, NY 10019

Attorneys for Plaintiff Railroad Insurance Underwriters

Brian E. O'Donnell, Esq.
RIKER, DANZIG, SCHERER, HYLAND & PERRETTI LLP
500 Fifth Avenue, Suite 4920
New York, NY 10110
(212) 302-6574

*Attorneys for Excess Insurance Company Limited
and Harper Insurance Limited*

David P. Stich, Esq. (DPS-9096)
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New York, New York 10005
Local Counsel for Defendant
Certain Underwriters at Lloyd's, London

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

RAILROAD INSURANCE UNDERWRITERS,)	
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Plaintiff,)	
)	
v.)	
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CERTAIN UNDERWRITERS AT LLOYD'S,)	Case No. 07 Civ. 3071 (LLS)
LONDON, EXCESS INSURANCE)	
COMPANY LIMITED and HARPER)	
INSURANCE LIMITED,)	
)	
Defendants.)	
)	
)	

**AFFIDAVIT OF DAVID P. STICH, ESQ., IN SUPPORT OF MOTION TO ADMIT
COUNSEL PRO HAC VICE**

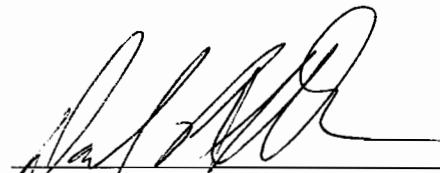
David P. Stich, being duly sworn, hereby deposes and says as follows:

1. I am a partner of Solomon Pearl Blum Heymann & Stich LLP, local counsel for Defendant Certain Underwriters at Lloyd's, London ("Lloyd's") in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Lloyd's motion to admit Bruce R. Grace of Baach Robinson & Lewis, PLLC, as counsel pro hac vice to represent Lloyd's in this matter.
2. I am a member in good standing of the bar of the State of New York and was admitted to practice law in 1991. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. I have known Bruce Grace since being introduced to him about thirty days ago. However, I have known the firm of Baach Robinson & Lewis PLLC for the last few

years, having worked with many of the firm's attorneys. All of the attorneys with whom I have worked are of outstanding character and I believe that Mr. Grace will be of similar good character.


4. I have found Mr. Grace to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Civil Procedure.
5. Attached hereto are original Certificates of Good Standing for Attorney Grace from the District of Columbia Court of Appeals dated April 20, 2007 and from the Supreme Court of the State of New York, Third Appellate Division dated May 7, 2007.
6. Accordingly, I am pleased to move the admission of Bruce Grace, pro hac vice.
7. I respectfully submit a proposed order granting the admission of Bruce Grace, pro hac vice, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Bruce Grace, pro hac vice, to represent Plaintiff in the above captioned matter, to be granted.



David F. Stich, Esq. (DPS-9096)

Sworn to before me this
8th day of May, 2007



Notary Public
WILLIAM L. FLUM
Notary Public, State of New York
No. 24600011
Queens County
My Comm. Expires Nov 2, 2010



State of New York
Supreme Court, Appellate Division
Third Judicial Department

I, Michael J. Novack, Clerk of the Appellate Division of the Supreme Court of the State of New York, Third Judicial Department, do hereby certify that

Bruce Ronald Grace

having taken and subscribed the Constitutional Oath of Office as prescribed by law, was duly licensed and admitted to practice by this Court as an Attorney and Counselor at Law in all courts of the State of New York on the 28th day of March, 1989, is currently in good standing and is registered with the Administrative Office of the Courts as required by section four hundred sixty-eight-a of the Judiciary Law.

In Witness Whereof, I have hereunto set my hand and affixed the Seal of said Court, at the City of Albany, this 4th day of May, 2007.



Michael J. Novack

Clerk



District of Columbia Court of Appeals
Committee on Admissions
500 Indiana Avenue, N.W. — Room 4200
Washington, D. C. 20001
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia
Court of Appeals, do hereby certify that

BRUCE RONALD GRACE

was on the 10TH day of DECEMBER, 1990

duly qualified and admitted as an attorney and counselor and
entitled to practice before this Court and is, on the date
indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have
hereunto subscribed my name
and affixed the seal of this
Court at the City of
Washington, D.C., on April
20, 2007.

GARLAND PINKSTON, JR., CLERK

By: 
Deputy Clerk

David P. Stich, Esq. (DPS-9096)
Solomon Pearl Blum Heymann & Stich LLP
40 Wall Street, 35th Floor
New York, New York 10005
Local Counsel for Defendant
Certain Underwriters at Lloyd's, London

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

RAILROAD INSURANCE UNDERWRITERS,)	
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Plaintiff,)	
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CERTAIN UNDERWRITERS AT LLOYD'S,)	Case No. 07 Civ. 3071 (LLS)
LONDON, EXCESS INSURANCE)	
COMPANY LIMITED and HARPER)	
INSURANCE LIMITED,)	
)	
Defendants.)	
)	

ORDER FOR ADMISSION PRO HAC VICE ON WRITTEN MOTION

Upon the motion of David P. Stich, local counsel for Certain Underwriters at Lloyd's, London,
and said sponsor attorney's affidavit sworn to May 8, 2007, in support;

IT IS HEREBY ORDERED that

Applicant's Name: Bruce R. Grace
Firm Name: Baach Robinson & Lewis PLLC
Address: 1201 F Street, NW, Suite 500
City/State/Zip: Washington, DC 20004-1225
Phone Number: 202-659-6742
Fax Number: 202-466-5738
Email: bruce.grace@baachrobinson.com

is admitted to practice pro hac vice as counsel for Underwriters at Lloyd's, London in the above
captioned case in the United States District Court for the Southern District of New York. All

attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov.

Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated: New York, New York
May ____, 2007

SO ORDERED:

U.S.D.J.

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

RAILROAD INSURANCE UNDERWRITERS,)	
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Plaintiff,)	Case No. 07 Civ. 3071 (LLS)
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v.)	
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CERTAIN UNDERWRITERS AT LLOYD'S,)	
LONDON, EXCESS INSURANCE)	
COMPANY LIMITED and HARPER)	
INSURANCE LIMITED,)	
)	
Defendants.)	
)	

AFFIDAVIT OF
SERVICE

✓
O.K.

STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

YESENIA E. ZEA, being duly sworn, hereby deposes and says:

1. I am over eighteen years of age, not a party to this action and reside in Queens, New York.

2. On May 8, 2007, I served copies of the annexed MOTION TO ADMIT COUNSEL PRO HAC VICE, by depositing the same, enclosed in a securely sealed first class postage paid envelope, in an official depository under the exclusive care and custody of the United States Postal Service within the State of New York addressed to:

Allan J. Sorkowitz, Esq.
SIDLEY AUSTIN LLP
787 Seventh Avenue
New York, NY 10019
Attorneys for Plaintiff Railroad Insurance Underwriters

-- and --

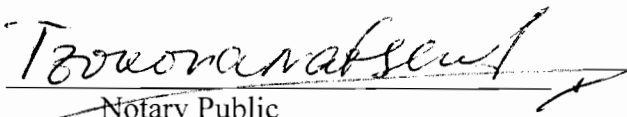
Brian E. O'Donnell, Esq.
RIKER, DANZIG, SCHERER, HYLAND & PERRETTI LLP
500 Fifth Avenue, Suite 4920
New York, NY 10110
(212) 302-6574

*Attorneys for Excess Insurance Company Limited
and Harper Insurance Limited*



YESENIA E. ZEA

Sworn to before me this
8th day of May, 2007



Notary Public

Maria Tzokova Natseva
Notary Public, State of New York
Registration No. 02TZ6134544
Qualified in Westchester County
My Commission Expires October 3, 2009